

**arbo
unie**



Privacy Statement

Arbo Unie B.V. and its labels mkbasics, belife
and Port Health Centre

July 2026

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Foreword

Arbo Unie promotes the vitality and health of working people and thereby makes organizations more successful. Our aim is to ensure that people feel well by improving the safety and conditions in which and under which they work. This results in engaged and motivated individuals who operate at their full potential and derive satisfaction from their work and life. Each label contributes to this from its own perspective and specialization.

With this privacy statement, Arbo Unie informs you about the personal data that are processed and how these are protected. This privacy statement describes the processing of personal data of clients, customers (employers), and visitors to Arbo Unie websites.

In addition, this privacy statement explains your rights under privacy legislation and how you can exercise these rights with Arbo Unie.

This privacy statement applies to all labels of Arbo Unie:

- Arbo Unie
- Mkbasics
- Belife
- Port Health Centre

In this privacy statement, all these labels are referred to as “Arbo Unie.”

In this privacy statement, we inform you about how Arbo Unie and its labels handle personal data and how we fulfill the rights and obligations arising from this.

We are aware of the importance of confidentiality of information and personal data. This requires a proactive policy. Arbo Unie actively contributes to the development of industry-wide privacy guidelines and standards. A team of privacy and information security specialists, including a Corporate Information & Security Officer (CISO), Privacy Officer (PO), and Data Protection Officer (DPO), advises and supervises compliance on a daily basis. We only record (personal) data that are necessary for the performance of our tasks.

Our professionals handle personal data with great care. In addition to (privacy) laws and regulations, we also follow applicable guidelines and protocols of, among others, our industry and professional associations. We are regularly audited by an accredited certification body (DNV). We hold the necessary certifications to justify your trust in us.

Arbo Unie and its labels are certified against the following standards:

- SBCA Certification Scheme for Occupational Health Services (Ministry of Social Affairs and Employment);
- ISO 9001 Quality Management;
- ISO 27001 Information Security;
- NEN 7510 Information Security in Healthcare.

Arbo Unie and its labels jointly operate under one Privacy and Information Security Policy. Arbo Unie regularly conducts risk analyses, works in accordance with this policy, and periodically verifies its effectiveness.

If you believe that Arbo Unie is not handling your personal data carefully, you can discuss this with your practitioner or contact person. If you do not have one, you can send a request to functionarisgegevensbescherming@arbounie.nl. For more information about your rights, see the section “What are your rights?”.

Controller details:

Arbo Unie B.V.
Nevelgaarde 42
3436 ZZ Nieuwegein
088 272 68 00
info@arbounie.nl

Data Protection Officer:

Arbo Unie has appointed a Data Protection Officer in accordance with Article 37 GDPR. You can contact this officer for all privacy-related questions via:
functionarisgegevensbescherming@arbounie.nl.

Board of Directors Arbo Unie

Explanation of the Privacy Statement

During the provision of our services, personal data are processed, for example when you attend a consultation with one of our occupational physicians or during a Preventive Medical Examination (PMO). This privacy statement describes which personal data we process and what your rights are.

What are personal data?

Personal data

The GDPR (General Data Protection Regulation) defines personal data as follows: *“all information relating to an identified or identifiable natural person (‘the data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more elements specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.”*

Personal data are data that relate to you as a person, such as your name, address, email address, and telephone number. Your citizen service number (BSN), date of birth, and IP address are also considered personal data. There is also a category of special categories of personal data, which are particularly sensitive. These include data about health, racial or ethnic origin, sexual orientation, religious beliefs, and political opinions.

Processing

Arbo Unie processes your personal data when, for example, your employer reports you sick, when you contact Arbo Unie for a preventive consultation, or when you register (e.g., via the client portal).

Processing includes almost all actions involving personal data, from collection to deletion. The GDPR defines processing as *“an operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction of data”*.

If Arbo Unie provides care, it creates an occupational medical file containing personal data, including medical data.

It is important to realize that Arbo Unie processes your personal data with great care. In doing so, Arbo Unie complies with the applicable laws and regulations, including the General Data Protection Regulation (GDPR), the Dutch GDPR Implementation Act (UAVG), the Working Conditions Act, the Medical Treatment Contracts Act (WGBA), and many guidelines in the field of working conditions. This means, among other things, that Arbo Unie:

- informs you, in a clear and transparent manner through this privacy statement, about how and for which purposes your personal data are processed;
- processes personal data only for specified purposes and bases the processing on one of the legal grounds set out in the GDPR;
- takes appropriate security measures to protect personal data against loss and theft;
- informs you about your rights with regard to your personal data;
- has appointed a Data Protection Officer who monitors the careful processing of personal data within Arbo Unie, oversees compliance with obligations under the GDPR, and acts as a contact point for the Dutch Data Protection Authority.

Purposes of the processing of personal data

Arbo Unie processes your personal data for the services outlined below at a high level:

- Recovery – Sickness absence management;
- Prevention – Preventive services;
- Strengthening – Advising on sustainable employability and vitality;
- Recruitment – Handling job applications.

More specifically, Arbo Unie, as an occupational health service and as an independent controller, processes your personal data for the following purposes: providing services to employers and employees in the field of working conditions and sickness absence management (legal basis in Article 14 of the Working Conditions Act), including video consultations (via Microsoft Teams), reintegration, interventions, preventive services including PAGO¹/PMO², all client and customer contacts, quality purposes, medical examinations, workplace assessments, vaccinations, lifestyle, vitality, education/training, evaluation of services, complaints, claims, incidents (incident registration), as well as scientific research.

Arbo Unie supports clients (your employer) in fulfilling the employer's legal obligations in the areas of sickness absence, reintegration, and prevention. In the performance of our services, we never share substantive information with your employer about a conversation between an employee and a professional. Within the applicable legislation, we do inform the employer about what an employee can and can no longer do, whether suitable work can be performed, the expected duration of recovery, and whether additional activities are required to expedite recovery and return to work.

An employer may, when an employee reports sick, request and record the following data regarding their health:

- the telephone number and (nursing) address;
- the expected duration of the sickness absence;
- current appointments and activities;
- whether the employee falls under one of the safety net provisions of the Sickness Benefits Act (but not which specific provision);
- whether the illness is related to an occupational accident;
- whether there is a traffic accident involving a potentially liable third party (right of recourse).

¹ PAGO (Dutch: *Periodiek Arbeidsgezondheidskundig Onderzoek*) stands for: Periodic Occupational Health Examination, and is based on Article 18 of the Working Conditions Act.

² PMO (Dutch: *Preventief Medisch Onderzoek*) stands for Preventive Medical Examination, and is based on Article 18 of the Working Conditions Act.

In principle, the employer may not process any health data other than the data listed above, not even with the employee's consent. Given the hierarchical relationship between employer and employee, an employee may feel compelled to give consent, meaning that there is no 'freely given' consent. Only if an employee has a condition for which it may be necessary that immediate colleagues know how to act in case of an emergency (for example epilepsy or diabetes), may the employer record the health data voluntarily provided by the employee.

Based on the principle of good employership and cooperation in reintegration, you are in some cases obliged to provide Arbo Unie with data regarding your health. If you do not provide such data, it may be that we cannot provide proper advice to you and your employer. We will always inform you of this. This may mean that your employer may attach employment law consequences to this.

In the context of sickness absence management, Arbo Unie may only provide an employer with the information necessary to make decisions regarding continued payment of wages, sickness absence management, and reintegration. Arbo Unie may provide the following data regarding the health of a sick employee to the employer:

- the activities the employee is no longer able or still able to perform (functional limitations, residual capacity, and implications for the type of work the employee can still perform);
- the expected duration of the sickness absence;
- the extent to which the employee is incapacitated for work (based on functional limitations, residual capacity, and implications for the type of work the employee can still perform);
- any advice regarding adjustments, workplace provisions, or interventions that the employer must implement for reintegration.

The occupational physician/occupational health service must exercise great restraint when providing health data of a sick employee to the employer based on the employee's consent..

In the context of preventive services, such as a PAGO, PMO, or other services for which Arbo Unie acts as an independent controller, Arbo Unie may contact employees to invite them to participate in such an (sometimes legally required) examination. For this purpose, Arbo Unie receives a file from the employer. Based on this file, for which Arbo Unie itself is the controller, Arbo Unie will invite employees. Participation in a PAGO/PMO examination is voluntary. The employer will not have access to information about which employees do or do not participate in the examination. Employees who do not participate will be removed from Arbo Unie's file within one month after completion of the examination. Reports to the employer will contain only data that cannot be traced back to an individual, thereby guaranteeing the anonymity of employees.

Arbo Unie may further process the personal data it processes for analysis, statistics, and (scientific) research, insofar as this is permitted under privacy laws and regulations. An example of this is the preparation of reports, such as sickness absence overviews and group reports or (sickness absence) statistics for employers (our clients).

In addition, Arbo Unie conducts research to improve our care provision to employees. This is carried out through file research. This research is conducted, among other methods, through sampling or based on a selection of file characteristics (such as diagnosis or type of absence). Activities in the field of (scientific) research, analysis, and statistics are in principle carried out only using data that cannot be traced back to an individual. If required by law, we will request the employee's prior consent for this.

Arbo Unie may, within the framework of applicable privacy legislation (including, but not limited to, the General Data Protection Regulation (GDPR)) and this Privacy Statement, process personal data for the deployment, optimization, and improvement of systems, including Artificial Intelligence (AI) and machine learning applications. These processing activities take place with appropriate safeguards for the rights and freedoms of data subjects and may include, among other things:

- the application of AI to support services provided to clients, employers, and professionals. For example, during a consultation, automatically converting the conversation into text (transcription), after which the AI system generates a logical summary. The professional carefully reviews this summary before it is included in the medical file;
- the use of anonymized or pseudonymized data for quality improvement purposes (see the section entitled Quality Research in this Privacy Statement).

AI, algorithms, and ML are important tools for Arbo Unie. Through the intelligent use of available data, Arbo Unie can perform its tasks as efficiently and effectively as possible. Examples include developing and using predictive models to estimate the duration of sickness absence and take timely appropriate actions, and generating transcripts and summaries following a consultation, enabling the healthcare professional to fully focus on the conversation.

Arbo Unie complies with the applicable regulations when using AI and ML. Arbo Unie periodically tests the deployed AI and ML models for validity (proper functioning). Furthermore, Arbo Unie improves the models where possible and, if necessary, based on the experience gained. Arbo Unie provides clear explanations and instructions to employees who work with the results of AI or ML, so that it is clear to them that these results are (no more than) supportive in the autonomous considerations employees make in the performance of their tasks.

When processing special categories of personal data, Arbo Unie complies with the specific rules that apply to them.

Arbo Unie may process your personal data because this is necessary for the performance of its services, often based on a legal obligation. Arbo Unie uses AI and ML as tools in the execution of certain tasks that would be much less efficient and effective, or even (almost) impossible, without AI or ML.

Arbo Unie does not make automated decisions based on profiling within the meaning of the GDPR. This means that an Arbo Unie employee always makes the final decision based on their own assessment following AI advice.

Arbo Unie has established retention periods for each processing activity involving personal data. Arbo Unie does not retain your data longer than necessary or legally permitted for the purposes of processing.

The client portal is an application made available by Arbo Unie to enable secure communication with sick clients and clients who voluntarily register for advice on prevention and vitality. For the use of the client portal, Arbo Unie processes your name, date of birth, and address details and, in the case of sickness absence, also your citizen service number (BSN). Providing your BSN is a mandatory requirement for creating your medical file and initiating socio-medical guidance.

For the execution of questionnaires, Arbo Unie also processes your mobile phone number and/or email address. In the client portal, you can securely access various information about your contact with Arbo Unie. For example, you can find consultation reports, a problem analysis, feedback from a questionnaire, or an authorization provided by you.

The client portal provides you, as a client, with insight into all relevant information in one central location. Confidentiality and security are adequately safeguarded through the use of the client portal. For questions regarding the agreements between Arbo Unie and your employer, we refer you to your employer's HR department. After termination of the services provided by Arbo Unie to your employer, your access to your information via the client portal will also cease. We advise you to download relevant documents yourself if you wish to retain access to them at all times.

For certain services, such as Arbo Unie Vitality and Arbo Unie Verbanen, your consent (voluntary participation) forms the basis for the provision of these services. For a specific description of these services, we refer you to the website.

During the recruitment process, we request personal data from you, such as your name, address, and place of residence. We also request data regarding education and diplomas, employment history, and references. We may also search for your (professional) profiles on online social networking sites, such as LinkedIn. In addition, we request a Certificate of Conduct (VOG (Dutch: Verklaring Omtrent Gedrag)):

- Assessing the data with a view to potentially entering into an employment relationship;
- Verification purposes;
- Compliance with legal obligations.

Legal basis for the processing of personal data

As a healthcare provider, Arbo Unie processes personal data of employees because it is under a statutory obligation to do so pursuant to, inter alia, the Medical Treatment Contracts Act ('WGBO') and the Working Conditions Act.

Arbo Unie is authorized to process personal data on behalf of companies and institutions. The health data that Arbo Unie receives from the employees (referred to as 'clients') of companies or from benefit recipients is classified as 'special categories of personal data'. Arbo Unie is required to handle this data with the utmost care. The collection of this data is permitted within the framework of an employment relationship or social security. The processing of personal data is based on Articles 6 and 9 of the General Data Protection Regulation (GDPR), as well as Article 30(1) of the Dutch GDPR Implementation Act (UAVG). This involves the performance of a contract and statutory obligations (including Article 14 of the Working Conditions Act and other laws and regulations applicable to Arbo Unie regarding absence management and other statutory services and tasks).

Arbo Unie processes the citizen service number (BSN) pursuant to its statutory obligations under the Healthcare Quality, Complaints and Disputes Act (Wkkgz) and the Additional Provisions for the Processing of Personal Data in Healthcare Act, as well as Article 14(6) of the Working Conditions Act, the General Provisions Citizen Service Number Act, and the Regulation on the Use of the Citizen Service Number in Healthcare. The BSN is only processed upon the creation of a medical file by Arbo Unie and at the commencement of socio-medical supervision.

To prevent identity fraud or confusion, Arbo Unie is statutory required to use the BSN in communications with other healthcare institutions and government bodies such as the Employee Insurance Agency (UWV). During a consultation, your identity will be verified based on a statutory ID and verification of the BSN. Arbo Unie only obtains access to the necessary personal data of employees when required by law, namely at the moment the provision of care to an employee commences. If no care is provided, Arbo Unie will not have access to the personal data of employees. This is also safeguarded within the software made available to employers and employees as part of our services. If you register as a client with Arbo Unie for information regarding prevention or vitality, we will process your personal data based on your voluntary registration. Naturally, Arbo Unie will then process your personal data.

If Arbo Unie collaborates with third parties for the purpose of (scientific) research, analysis, or statistics, Arbo Unie will provide anonymized data, or identifiable data where legally permitted, to these third parties to the extent necessary to conduct the research, analysis, and/or statistics, and insofar as permitted under applicable laws and regulations. Arbo Unie bases this processing on Article 9(2)(j) of the GDPR, in conjunction with Article 24 of the UAVG and Article 7:458 of the Dutch Civil Code (BW).

The research must serve a public interest, and Arbo Unie will assess for each scientific study whether the statutory requirements are met. This further processing is permissible based on Article 5(1)(b) in conjunction with Article 89 of the GDPR. In this context, personal (medical) data is used for scientific research in a manner that prevents traceability to individual persons. If you do not wish for your data to be used for scientific research purposes, you have the right to object (Article 7:458(2)(c) of the Dutch Civil Code). You can submit your objection via: functionarisgegevensbescherming@arbounie.nl.

Arbo Unie may provide personal data to (government) agencies, such as Statistics Netherlands (CBS) and the National Institute for Public Health and the Environment (RIVM), if they are authorized or obligated by virtue of their statutory tasks to receive personal data from us. Arbo Unie will only do so if permitted under applicable laws and regulations.

Quality assurance

Arbo Unie strives for continuous improvement of the quality of its services. For this reason, healthcare professionals have been selected to conduct quality assurance. This is carried out through file research. This research is conducted, among other methods, through sampling or based on a selection of file characteristics. If you object to your medical file potentially being reviewed for this quality assurance, you can inform your contact person within Arbo Unie. Your file will then not be included in a quality assurance. If you still have objections afterward, you can indicate this via: functionarisgegevensbescherming@arbounie.nl.

Use of medical data for complaint and claim handling

Arbo Unie attaches great importance to the careful assessment of complaints and claims relating to the medical actions or omissions of (occupational) physicians. In the context of a professional and objective assessment, (occupational) physicians against whom a complaint has been filed may, without the consent of the employee concerned, submit the medical file to designated colleagues, such as a supervising physician, a coordinating occupational physician, a health officer, or a medical director. These individuals are selected based on their expertise and independence, with the aim of forming a professional judgment regarding the medical actions or omissions of the (occupational) physician concerned.

Arbo Unie only shares medical data with a claims handler, legal counsel, or liability insurer if this is necessary for the handling of a medical claim and the employee concerned has provided written consent for this through a medical authorization. If you do not provide consent in this situation, you can indicate this to your (occupational) physician or contact person within Arbo Unie. The consequence of this is that Arbo Unie cannot and is not required to assess the medical claim substantively.

Arbo Unie has a legitimate interest in processing personal data where this is necessary for securing property and access. For example, Arbo Unie may use camera surveillance. If this is the case, it will always be indicated on site.

In other situations where we require data outside these legal grounds, we will explicitly request your consent.

Job applications

The basis for the processing of the personal data we use is laid down in Article 6 of the General Data Protection Regulation (GDPR). The processing is necessary for the potential conclusion of an employment agreement. We may also request you to cooperate in a (psychological) assessment. This is always on a voluntary basis and requires your consent.

Which personal data does Arbo Unie process?

Depending on the assignment provided to Arbo Unie, Arbo Unie processes the following personal data:

Employee/client

- First name and/or initials;
- Last name;
- Date of birth;
- Gender;
- Citizen service number (BSN);
- Employee ID³

Contact details

- Address details;
- Business telephone number;
- Private telephone number;
- Business email address and/or;
- Private email address.

Employer

- Name, address, and contact details of the company;
- Personnel number;
- Department;
- Position;
- Employment;
- Date of employment;
- End date of employment;
- Supervisor:
 - First name and/or initials;
 - Last name;
 - Business telephone number (landline and/or mobile);
 - Business email address.

Practitioner(s)

- Name, address, and contact details of the general practitioner;
- Name, address, and contact details of any other practitioners.

Sickness notification

- First day of sickness absence;
- Date and percentage of partial recovery;
- Date of full recovery.

³ This refers to the Employee ID or another code specific to an employee that replaces the citizen service number as a key value, as described in the National Absence Standard ("NVS") 2017. This standard is endorsed by occupational health services affiliated with the industry organization OVAL and is managed by the Stichting Sivi.

Sickness absence and reintegration management

- (Estimated) duration of the sickness absence;
- Number of hours per day or per week that the employee can perform their own or suitable work, including the start date (phased return schedule);

- Whether there is any form of compensation, such as a safety net situation or recourse;
- Advice on necessary interventions, whether and when an intervention has been initiated, and the costs of the intervention;
- Vision regarding the sick and/or incapacitated employee to be reintegrated;
- Translation of medical data by the occupational physician into limitations and possibilities of the sick and/or incapacitated employee;
- Gatekeeper reports, such as the problem analysis;
- Work capacity: the activities the sick and/or incapacitated employee is or is not able to perform, including physical and mental capabilities and limitations;
- Report of the occupational consultant, in which work capacity is translated into concrete possibilities for performing work;
- Advice on any necessary adjustments or workplace provisions;
- Advice on an intervention aimed at increasing work capacity;
- Planning of the reintegration trajectory.

Consultation

- Data resulting from the consultation;
- Data resulting from the sickness notification by the employer and the subsequent self-declaration;
- Data resulting from a home visit;
- Work capacity in relation to work demands;
- Proposed and implemented reintegration measures and adjustments to working conditions;
- Results of consultations with the employer, practitioners, social security institutions, and insurance companies;
- The activities the employee is or is not able to perform;
- The expected duration of the sickness absence;
- The extent to which the employee is incapacitated for work;
- Any adjustments or workplace provisions the employer must implement in the context of reintegration;
- Information about the private and work situation of the data subject insofar as necessary for guidance.

Research

- Working conditions;
- Results of incidental and periodic health assessments.

Other data necessary for reintegration (including reintegration possibilities)

- Brief description of the case;
- Assessment of the outcomes of an assessment;
- Issued advice.

Preventive services

Depending on the assignment provided to Arbo Unie, Arbo Unie processes the following personal data:

- First name;
- Last name;
- Gender;
- Date of birth;
- Citizen service number (BSN);
- Email address;
- (Mobile) telephone number;
- Education;
- Business unit;
- Department;
- Position;
- Sector;
- Self-assessment questionnaires, various types of questionnaires regarding:
 - Health;
 - Knowledge and skills;
 - Motivation;
 - Work-life balance;
 - Health behavior;
 - Development;
 - Work experience.
- Physical measurement data, such as:
 - BMI;
 - Body fat percentage;
 - Waist circumference;
 - Cholesterol;
 - Glucose;
 - Blood pressure;
 - Vision;
 - Strength;
 - Fitness;
 - Lung function;
 - ECG;
 - Audiometry;
 - Urinalysis;
 - Extensive blood tests;
 - Musculoskeletal examination.
- Report of a coaching session with advice for the data subject.

Advising on sustainable employability

Depending on the specific assignment provided to Arbo Unie, Arbo Unie processes the following personal data:

- First name;
- Last name;
- Company name;
- Position;
- Email address;
- Telephone number;
- Brief description of the case;
- Issued advice regarding (personal) leadership;
- Evaluation of a training.

With regard to the information that Arbo Unie provides to the client (employer) concerning sickness absence, Arbo Unie complies with the guidelines of the Dutch Data Protection Authority⁴. For specific information on this, see page 8.

Handling job applications

Depending on the CV provided to Arbo Unie, Arbo Unie processes the following personal data during the recruitment process:

- First name;
- Last name;
- Gender;
- Address;
- Place of residence;
- Date of birth;
- Email address;
- (Mobile) telephone number;
- Education;
- Diplomas;
- Employment history;
- References;
- (Professional) profiles on online social networking sites (such as LinkedIn);
- Certificate of Conduct (VOG).

Digital questionnaire (Recovery pathways)

Arbo Unie may carry out a digital preparation after the employer has submitted a sickness notification. Arbo Unie does this after the third day following receipt of the sickness notification from the employer. The employee will then receive a digital questionnaire with a request to complete it. Arbo Unie subsequently uses science and data science to more accurately determine the optimal moment to schedule an appointment with our professionals. In doing so, Arbo Unie uses a combination of the following data: responses to the online questionnaire, the number of sickness notifications and absence days in the past 12 months, age, gender, whether the employee works in a small or large company, and whether there are consecutive sickness notifications within 28 calendar days. This does not involve automated decision-making.

Arbo Unie locations

If you visit a location of Arbo Unie, it is possible that your presence will be recorded. This can take place in two ways:

- *Camera footage.* Only a limited number of individuals who are authorized to do so based on their role may view these recordings, and only if there is a specific reason to do so, for example because an incident has occurred or to verify the validity of a complaint. Viewing camera footage can only take place at the location where it was recorded and not remotely. If camera surveillance is in place, this will always be indicated at the location itself.
- *Visitor registration.* When you report to the reception at an Arbo Unie location, your first and last name and the time of your appointment may be recorded at the reception. The purpose of this registration is to ensure the proper course of the appointment. Visitor registration is retained until the end of the working day at most.

Website

If you use the websites of Arbo Unie, Arbo Unie processes your data. For example, your IP address, data regarding your visit to the website, and the device used to access the website. More information can be found in the cookie statement of the specific website.

⁴ See the publication "The sick employee" from 2016.

From whom does Arbo Unie receive personal data?

Arbo Unie receives data primarily from your employer (directly or indirectly), the sickness absence insurer, or from yourself. Arbo Unie also receives (medical) reports and decisions from the Employee Insurance Agency (UWV). In addition, Arbo Unie may—subject to your consent—receive data from other practitioners, such as your general practitioner, an occupational consultant, a reintegration company, or a treating specialist. Arbo Unie does not collect personal data from public sources.

With whom does Arbo Unie share your personal data?

Various parties are involved in the services and activities of Arbo Unie. These may include government authorities, your employer, or an engaged practitioner. These parties only process your personal data if this is necessary for the performance of their tasks and is permitted by law. Arbo Unie never shares medical information with other parties unless you have given your consent, or there is a legal obligation or court ruling requiring this. Below is an overview of the parties with whom Arbo Unie shares personal data.

Employers

Within the scope of service provision, information may be shared with your employer.

For sickness absence and reintegration management, only the (health) data necessary for adequate absence management and reintegration are shared, including, but not limited to: gatekeeper documents, the degree of incapacity for work, translation of medical data into limitations and capabilities, advice on any necessary adjustments or workplace provisions, and advice on interventions aimed at increasing work capacity.

The occupational health consultation contributes to the prevention of sickness absence and occupational diseases. You can request this consultation directly from Arbo Unie if you have questions about your mental and physical health in relation to your work and working conditions, for example in case of early complaints.

Information about the occupational health consultation, including whether it has taken place, is never shared with your employer.

Through the Periodic Occupational Health Examination (PAGO) and Preventive Medical Examination (PMO), you gain insight into possible work-related health effects. This includes factors that influence your work and private situation, as well as your personality, coping capacity, and energy sources.

Information about the PAGO and PMO is never shared with your employer.

Pre-employment medical examinations may be conducted within the legal framework (Medical Examinations Act). A pre-employment examination is a medical assessment focused on the requirements of a position. The result of the examination is shared with your employer with your consent.

For certain professions, a medical examination is mandatory, such as firefighter, taxi driver, professional diver, or offshore worker. This also applies to professions involving work in contaminated soil, frequent exposure to radiation, or carcinogenic substances. If an employee disagrees with the outcome, they may in some cases have the right to a re-examination, provided this is stipulated in a specific regulation (law or collective labor agreement). There is no general right to a re-examination. In such cases, communication of the result to the employer is suspended until after the re-examination.

For other services, such as employee assistance programs, workplace assessments, and lifestyle coaching, data are only shared with your employer in compliance with the Working Conditions Act, the General Data Protection Regulation (GDPR), the WGBO, the Individual Healthcare Professions Act (BIG), and applicable guidelines and codes of conduct.

Your employer may receive employer/group reports for certain services. Examples include sickness absence reports, employer reports of a PAGO/PMO, and group reports of medical examinations. Information within Arbo Unie is adjusted in such a way that the reports can never be traced back to an individual.

For the provision of certain services, your employer receives an invoice. In invoicing, only data are shared with your employer in compliance with applicable laws and regulations.

Internal and external practitioners

Within Arbo Unie, the term 'practitioner' is a broad concept that includes various professions/functions, both medical and non-medical professionals. These include, among others, the occupational physician, occupational health nurse, occupational hygienist, social worker, confidential counselor, ergonomist, safety expert, work and organizational consultant, case manager, occupational consultant, advisor on work and employability, and psychologist.

During the provision of services, (external) practitioners within your treatment team have access to your data that are necessary for performing their tasks. This means that the treatment team for sickness absence and reintegration activities may differ from your treatment team for medical examinations.

Data exchange between practitioners who are not part of the same treatment team only takes place with your consent.

In the execution of services, Arbo Unie may make use of engaged and/or external practitioners. Arbo Unie makes appropriate agreements with these practitioners to ensure that they comply with applicable laws, regulations, and professional guidelines to the same extent as Arbo Unie employees.

Intervention parties

In specific situations, Arbo Unie may exchange information with other parties.

For example, this may involve a rehabilitation specialist, physiotherapist, or psychologist to whom you are referred, in consultation with the (occupational) physician, in the context of your sickness absence and reintegration. We provide such intervention parties only with general personal data, such as name, address, place of residence, and contact details.

These parties will only receive additional data, such as medical data, if this is necessary and only with your consent.

If you wish to know which data these parties process, you can request this from the relevant party or consult their privacy statement.

Government authorities

Arbo Unie provides personal data to government authorities when this is necessary for the statutory tasks of these authorities.

Arbo Unie may provide personal data to the Employee Insurance Agency (UWV) on the basis of social insurance legislation and the SUWI Act. This may occur, for example, when you apply for a Dutch Work and Income (Capacity for Work) Act (WIA) benefit, request an expert opinion, or leave employment while sick. In such cases, the occupational physician provides the insurance physician of the UWV with a current assessment and necessary medical data so that your medical situation can be evaluated.

In addition, Arbo Unie may submit a 42nd-week notification to the reintegration department of the UWV on behalf of your employer.

The Netherlands Center for Occupational Diseases

The Netherlands Center for Occupational Diseases (NCvB (Dutch: Het Nederlands Centrum voor Beroepsziekten)) is the reporting center for occupational diseases. Occupational physicians and examining physicians are required to report to the NCvB if they determine that there is an occupational disease. The data received by the NCvB cannot be traced back to you as an individual unless you have given your consent..

Sickness absence insurer

Does your employer have insurance with a sickness absence insurer? In that case, the claims department of your sickness absence insurer receives absence data from Arbo Unie, such as sickness and recovery notifications and administrative data. The insurer requires these data to determine the amount of the benefit. The reintegration department of your sickness absence insurer may also receive reintegration data. Only the medical advisor has access to medical data.

Other parties

If desired, and only with your consent or if there is a legal basis, Arbo Unie may in specific cases exchange information with other parties.

For example, with a trustee, a physician providing a second opinion, or a lawyer.

It is possible that your employer has chosen to outsource part of the sickness absence management (such as case management) to a specialized party. On behalf of the employer, this party then receives personal data from Arbo Unie. These are the same data as those received by your employer. This party does not receive any medical data from Arbo Unie.

To ensure that Arbo Unie operates as effectively and efficiently as possible, some services are outsourced to external companies. These may include data centers, archive managers, companies providing (supporting) software, and web designers. Arbo Unie also engages companies that provide specialized services or conduct specific examinations, such as parties conducting home visits in case of absence, companies performing blood tests, and parties conducting satisfaction surveys on behalf of Arbo Unie. Finally, there are parties that gain access to data in the context of certification processes.

These external partners are carefully selected. Arbo Unie requires them to handle (privacy-sensitive) data with the same level of care as Arbo Unie itself.

Recruitment process

The data are only shared within Arbo Unie with managers and employees involved in the selection process.

How long does Arbo Unie retain your personal data?

Arbo Unie complies with the statutory retention periods. If no statutory retention period applies, Arbo Unie does not retain the data longer than necessary for the performance of the task. Below is an overview of the main retention periods.

- Arbo Unie is legally obliged to retain medical files for 20 years. In special cases, this may be 30 to 40 years, calculated from the date of the last modification in the file (or longer if a claim or legal proceeding is ongoing, or shorter if the client requests deletion or transfer). After termination of your employment or after our service agreement with your employer has ended, we may receive a request to transfer your personal data to your new occupational physician or occupational health service. In that case, we will transfer your personal data related to ongoing sickness cases to your new occupational physician or occupational health service, after which we will no longer retain these data. You may submit a request to have your

personal data erased. If there is no legal ground for refusal, your data will be erased. In the case of exposure to ionizing radiation in accordance with the Radiation Protection Decree (Article 100), we retain your personal data until you have reached or would have reached the age of 75.

- Arbo Unie is legally obliged to retain financial data for 7 years from the end of the calendar year.
- Data relating to mandatory pre-employment medical examinations are retained for 6 months. Where applicable, sickness absence and reintegration data under the act 'Wet verbetering poortwachter (WvP)' are retained for a maximum of 2 years after termination of employment or after the end of the agreement with the client, or longer if a claim or legal proceeding is ongoing, or shorter if the data subject requests deletion. Exceptions for longer retention periods also apply if there is a high likelihood that the employee will experience absence again for the same reason or if the file contains ongoing agreements. If the client is a self-insured employer, a retention period of 5 years after termination of employment applies. For Return to Work Scheme for the Partially Disabled (WGA (*Dutch: Werkhervatting Gedeeltelijk Arbeidsgeschikten*)) files, a retention period of 10 years after the end date of employment applies.
- Data relating to coaching, career guidance, and outplacement are retained for up to 2 years after the end of the guidance.
- Data relating to mediation are retained for at least 5 years after the end of the guidance due to potential liability.
- Management data, such as the number of trajectories, number, and duration, are retained indefinitely.
- Emails containing personal data are retained for a maximum of 1 year after receipt.
- Camera footage is retained for a maximum of 4 weeks.
- Standard log data are not retained longer than necessary. Insofar as Arbo Unie qualifies as a healthcare institution under the Wkkgz, log data of medical files are retained for at least 5 years from the date of the relevant log entry, in accordance with NEN 7513.
- Data are retained for up to 4 weeks after the end of the recruitment process, unless a longer period (up to a maximum of 1 year) has been agreed with consent.
- If you are employed, the data from the recruitment process will be included in your personnel file and retained in accordance with applicable retention periods.

What are the key measures to secure your personal data?

Arbo Unie considers the security of your personal data to be of great importance and devotes significant attention to it. Risk analyses are conducted on a regular basis, and new technological developments and threats are continuously assessed. We also regularly test the effectiveness of our information security system. We apply the ISO 27001 and NEN 7510 standards and guidelines for information security.

Arbo Unie takes appropriate technical and organizational measures to ensure the confidentiality, integrity, and availability of your personal data and ensures that these:

- are accurate, up to date, and correct;
- are adequately protected against loss or any form of unlawful processing, with ISO 27001 and NEN 7510 serving as the guiding frameworks;
- for online video consultations, Arbo Unie uses a secure platform (Microsoft Teams) that complies with the requirements of the GDPR, is properly secured, and holds ISO 27001 and NEN 7510 certification. During the online video consultation, only a (live) stream is used;
- Arbo Unie has concluded data processing agreements with suppliers that process data on behalf of Arbo Unie. These suppliers are required to implement at least the same security measures as Arbo Unie.

An important principle is that Arbo Unie processes personal data only within the European Economic Area (EEA). If personal data are stored outside the EEA, this will only take place after Arbo Unie has determined that an adequate level of protection is ensured in accordance with the requirements of privacy legislation.

If - despite all measures - a data breach or information security incident occurs, Arbo Unie will immediately take action to analyze the cause, limit the damage, and, where necessary, inform the Dutch Data Protection Authority and the relevant stakeholders.

What are your rights?

You have the right to submit a written request to us for:

- **Access to your personal data.** You may ask us whether we process your personal data. If this is the case, we will explain which personal data we process, how we process them, and for which purposes. You may also request a copy of the personal data we process about you.
- **Rectification of your personal data.** If you believe that the personal data we process about you are incorrect or incomplete, not relevant for the purpose of processing, or are being used in violation of the law, you may request us to supplement or amend your data.
- **Erasure of your personal data ('right to erasure').** You may request us to erase the personal data we process about you. We will erase your data without undue delay after receiving such a request if:
 - The data are no longer necessary for the purposes for which they were processed.
 - You withdraw your consent for the processing of your personal data.
 - You object to the processing and there is no legitimate reason for us to continue processing the data.
 - The personal data have been processed unlawfully ('unlawful processing').
 - We are legally obliged to erase the personal data.

If there is a legal ground for refusal, we may not erase the personal data upon request and will provide an explanation.

- **Restriction of the processing of your personal data.** You may request us to restrict the processing of your personal data. We will comply with such a request in the following cases:
 - You believe that the data we process about you are incorrect. Until the data have been verified and, if necessary, corrected or supplemented, we will not use these personal data.
 - We should not have processed the personal data, but you do not want us to (fully) erase your personal data.
 - You object to the processing of your personal data and we have not yet assessed this objection.

If the processing of your personal data is restricted, we will only process these data with your consent. Before the restriction is lifted, we will inform you accordingly.

- **Transfer of your personal data.** You may request a copy of the personal data we process about you. We will provide a copy in a commonly used format that is suitable if you wish to transfer the data to another service provider, such as another occupational health service. If technically feasible and upon your request, we can transfer the personal data directly to your new service provider.

- *Objection*If Arbo Unie processes personal data based on a legitimate interest, the data subject may object to the processing of their personal data. In that case, Arbo Unie will cease processing the relevant personal data during the handling of the objection and depending on the outcome of the decision on the objection. Processing will not be ceased if, in the opinion of Arbo Unie, its interests, the interests of third parties, or the public interest prevail in the specific case.

You can submit your request to your contact person and/or to the Data Protection Officer:
functionarisgegevensbescherming@arbounie.nl.

Notification

At your request, we may rectify, erase, or restrict the processing of your personal data. It may occur that we have provided the personal data to which your request relates to a third party. If we have rectified, erased, or restricted the processing of your personal data, we will inform these third parties accordingly, unless this is not possible for us. At your request, we will provide you with information about these third parties.

Right to object

You also have the right to object in writing to the processing of your personal data. If you object, we request that you explain to us why you disagree with the processing of your personal data.

Handling of your request

Requests submitted by you based on the above rights will be handled as soon as possible and in any case within one month of receipt. It may be that we need more time to process your request. If so, we will inform you of this no later than one month after receipt of your request. In that case, we may extend the period for responding to your request by a maximum of two months. If we do not or cannot comply with your request, we will inform you in writing and with reasons no later than one month after receipt of the request. In that case, you have the right to lodge a complaint with the Dutch Data Protection Authority or to refer the matter to the competent court.

Complaints

If you are not satisfied with the way we process your personal data, please contact us. You also have the right to submit a complaint to us. Please refer to the complaints procedure on our website. You also have the right to lodge a complaint with the Dutch Data Protection Authority. However, we kindly request that you first contact Arbo Unie regarding complaints or remarks, so that we can work together to find a solution.

Cookies

Arbo Unie uses cookies on its website. In our cookie statement, published on our website, you can read more about what cookies are and which cookies Arbo Unie places on its website.

Where can you find this privacy statement?

The most recent version of the privacy statement can be viewed and downloaded via the websites of our labels.

Third-party websites

This privacy statement does not apply to third-party websites that are linked to our website.

Changes

We reserve the right to amend this privacy statement. Changes will be published on our website. We therefore advise you to consult this privacy statement regularly so that you are aware of any changes.